

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE: VIJAY K. TANEJA,)	
Debtor,)	
_____)	
)	Case No. 08-13293-SSM
HSBC BANK USA NATIONAL)	
ASSOCIATION FOR MILMI)	Chapter 11
SERVICES 2006-A1 C/O)	
JP MORGAN CHASE BANK)	Jointly Administered
NATIONAL ASSOCIATION)	
F/K/A WASHINGTON MUTUAL)	Adv. No. 09-01047-SSM
BANK,)	
)	
Plaintiff,)	
)	
v.)	
)	
H. JASON GOLD, CHAPTER 11)	
TRUSTEE, <i>et al.</i> ,)	
)	
Defendants,)	
_____)	

**PLAINTIFF'S RESPONSE TO TRUSTEE'S
MOTION TO COMPEL DISCOVERY RESPONSES,
EXTEND DISCOVERY AND EXPERT DISCLOSURE DEADLINES
AND RE-SCHEDULE PRE-TRIAL CONFERENCE**

COMES NOW HSBC Bank USA National Association for MLMI Services 2006-A1 c/o JP Morgan Chase Bank National Association f/k/a Washington Mutual Bank (“HSBC”), by counsel, and files this Response to the Trustee’s Motion to Compel Discovery Responses, Extend Discovery and Expert Disclosure Deadlines and Reschedule Pre-Trial Conference (the “Motion”) and states as follows:

1. On June 1, 2009, HSBC provided its Response to Chapter 11 Trustee's First Request for Production of Documents and Objections and Answers to Chapter 11 Trustee's First Set of Interrogatories.

2. On June 18, 2009, HSBC provided its First Amended Objections and Answers to Chapter 11 Trustee's First Set of Interrogatories.

3. On July 20, 2009, HSBC produced additional documents. Production of these documents was delayed because HSBC's documents which are more than two years old are archived. It was necessary to retrieve the archived documents, including notes and comments for the loan since inception in 2005, from a storage warehouse.

4. HSBC has fully answered the Trustee's First Set of Interrogatories.

5. HSBC has produced all documents it can locate which are related to the loan which is the subject of this adversary proceeding.

6. HSBC will promptly produce any documents which HSBC hereafter discovers to be in its possession.

7. HSBC does not oppose extending the deadlines for discovery and expert disclosures.

WHEREFORE, HSBC respectfully requests that the Court deny the Trustee's Motion to Compel Discovery Responses.

Respectfully Submitted,

Bierman, Geesing & Ward, LLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Response was sent this 11th day of September 2009, either via the CM/ECF system, electronic mail or first-class mail, postage prepaid to:

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